

## UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee



United States of America  
v.  
PATRICK BRYANT HAWLEY

Case No.

1:24-mj-283-SKL

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2024 to present in the county of Hamilton in the  
Eastern District of Tennessee, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 48  
18 U.S.C. § 2251  
18 U.S.C. §§ 2252, 2252A  
18 U.S.C. § 2422

animal crushing  
sexual exploitation of children  
receipt, possession, and distribution of mat'l inv. sexual exploitation of minors  
coercion and enticement

This criminal complaint is based on these facts:  
Please see the attached affidavit, incorporated herein.

☒ Continued on the attached sheet.

*Complainant's signature*

G. David Nalley, Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

Nov. 14, 2024City and state: Chattanooga, Tennessee*Judge's signature*

SUSAN K. LEE, UNITED STATES MAGISTRATE JUDGE

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF**  
**AN ARREST WARRANT AND CRIMINAL COMPLAINT**

I, G. David Nalley, a Special Agent with Homeland Security Investigations, being duly sworn, depose, and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent (SA) with the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement, Homeland Security Investigations (HSI), whose duties include the investigation of violations of Title 18 United States Code, Section 2252 and 2252A; receipt, possession, or distribution of material involving the sexual exploitation of a minor. I have been a Special Agent for HSI since July of 2009 and have completed the Federal Law Enforcement Training Center Criminal Investigator Training Program, the ICE Special Agent Training Program, the DHS Cyber Crimes Center (C3) Online Undercover Investigations Course, the DHS C3 Child Exploitation Investigations Unit Advanced Child Exploitation Investigations Course, the DHS C3 Advanced Victim Identification Course, and the DHS C3 Basic Computer Evidence Recovery Training Course for digital forensics. As a federal agent, I am authorized to investigate violations of the laws of the United States and have the authority to execute warrants issued under the authority of the United States.

2. The statements in this affidavit are based on my investigation of this matter as well as information conveyed to me by other law enforcement officers, to include other HSI agents, as well as information obtained from local law enforcement officials. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause concerning Patrick Bryant HAWLEY having violated 18 U.S.C. §§ 48, animal crushing; 2251(a), sexual exploitation of children; 2252/2252A

certain activities relating to materials involving the sexual exploitation of minors; and 2422, coercion and enticement.

### **STATUTORY AUTHORITY**

3. As noted above, this investigation concerns alleged violations of the following:

a. Title 18, United States Code, Section 48(a)(1) prohibits any person from purposely engaging in animal crushing in or affecting interstate or foreign commerce; Section 48(a)(2) prohibits any person from knowingly creating an animal crush video if the animal crush video is obscene and is distributed in, or using a means or facility of, interstate or foreign commerce; and Section 48(a)(3) makes unlawful the knowing distribute an animal crush video in, or using a means or facility of, interstate or foreign commerce.

b. Title 18, United States Code, Section 2251(a) prohibits a person from using any minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct knowing that such visual depiction would be or was actually transported across state lines or produced using materials that traveled in or affected interstate or foreign commerce.

c. Title 18, United States Code, Section 2252(a) prohibits a person from knowingly transporting or shipping using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means or receiving, possessing, or distributing any visual depiction if the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct. Title 18, United States Code, Section 2252A(a) prohibits a person from knowingly transporting or shipping using any means or facility of interstate or foreign commerce or in or affecting

interstate or foreign commerce by any means or receiving, possessing, or distributing child pornography.

d. Title 18, United States Code, Section 2422(b) prohibits the use of any facility or means of interstate or foreign commerce to knowingly persuade, induce, or entice a minor to engage in any sexual activity for which any person can be charged with a criminal offense.

### **STATEMENT OF PROBABLE CAUSE**

1. On April 22, 2024, HSI Chattanooga received a lead from the HSI C3 Child Exploitation Investigation Unit (CEIU) concerning the username “ULTIMATEDADBOD” on a Swiss end-to-end encrypted application, hereinafter referred to as Application A<sup>1</sup>, as it relates to child sexual abuse material (CSAM)<sup>2</sup>. C3 received the lead from an HSI online undercover agent (UCA1) who was actively monitoring several Application A chat groups dedicated to the trade and dissemination of CSAM. UCA1 was located in South Carolina.

2. On April 10, 2024, UCA1 accepted ULTIMATEDADBOD’s request for a private chat. UCA1 reported that ULTIMATEDADBOD identified himself as a 42-year-old male from Tennessee with the name “Patrick.” During these chats, ULTIMATEDADBOD expressed his

---

<sup>1</sup> Application A is a sophisticated mobile application that requires little information on sign-up. The underlying company that runs Application A stores little data regarding each individual user. This is a predominant reason why certain individuals choose end-to-end encrypted applications, and Application A in particular: the individuals who use these applications for trading child sexual abuse material (CSAM) go to great lengths to avoid detection from law enforcement. Application A has servers outside the state of Tennessee; therefore, all communications through Application A travel in interstate commerce. UCA1 has been operating daily on Application A, where CSAM images and videos are traded across the world. The UCA1 works with several other UCAs on Application A and C3 to deconflict and prioritize possible producers of CSAM.

<sup>2</sup> Child sexual abuse material (CSAM) and *child pornography* are virtually synonymous. *Child pornography* is a legal term defined at 18 U.S.C. § 2256(8). “Child sexual abuse material” is a term used outside the legal setting, as “child sexual abuse material” more accurately reflects that underlying every sexually explicit image or video of a child is abuse, rape, and/or exploitation.



desires to have sexual contact with children. On April 12, 2024, UCA1 and ULTIMATEDADBOD had a private Application A chat conversation. During this chat conversation, ULTIMATEDADBOD expressed his desire to meet with UCA1 and UCA1's nominal four-year-old daughter and discussed the sexual acts he was interested in engaging in with UCA1's nominal child. ULTIMATEDADBOD also explained how to best groom the child for sexual abuse purposes. ULTIMATEDADBOD sent five digital images of himself to include an image where the name "Patrick Bryant Hawley" was visible on a certificate hanging on the wall. Another image contained exif data which revealed GPS coordinates for the address 511 Georgia Avenue, Chattanooga, Tennessee. ULTIMATEDADBOD admitted to UCA1 that he is vetting people for a chat room on Application A that contains "CP, newborn to 17/364."

3. Upon receiving this lead, HSI Chattanooga Criminal Analyst Sean Pettid prepared an intelligence report regarding HAWLEY utilizing open-source intelligence as well as commercially available databases offered to law enforcement. This report provided the following information:

Name:	Patrick Bryant HAWLEY
Year of Birth:	1982
Phone numbers:	(858) 997-6001 and (423) 752-1494
Residence:	116 S Hermitage Avenue, Lookout Mountain, Tennessee 37350
Additional Address:	511 Georgia Avenue, Chattanooga, Tennessee 37402 (Father's law office)
Business Interests:	licensed to practice law by the Supreme Court of Tennessee, practicing with David P. Hawley (Father) and Davis Firm, LLC (Noogalaw) at 1018 Dallas Road, Chattanooga, Tennessee 37405
Vehicles:	2011 Subaru Legacy wagon, green in color, state of Tennessee plate number 542BBVN

An Internet search for Patrick Hawley revealed links to websites advertising attorneys and, specifically, the Patrick B. Hawley Law Office located at 511 Georgia Avenue, Chattanooga,

Tennessee. The avvo.com profile also lists Hawley's Office as located at 511 Georgia Avenue, Chattanooga, Tennessee.

4. On September 18, 2024, HSI Chattanooga received information from a second undercover agent (UCA2) who was talking to HAWLEY in an undercover capacity. On September 16, 2024, UCA2 received a message from "hejumpsaround" who was interested in forming a relationship with a female pedophile and was looking forward to raising little girls to be "happy, health, amoral, free-use fuckholes." He went on to say he wanted to "look a mother in the eye" as he engaged in sex with her little girl. "hejumpsaround" focused much of the subsequent conversation around helping teach UCA2 how to properly groom her children to be comfortable with sex by exposing the children to pornography and by sleeping in the same bed with UCA2 and sexual partners. "hejumpsaround" suggested the same day that the chat correspondence be picked up using cellular SMS/MMS messages and provided his number as (858) 997-6001. UCA2 was located in Ontario, Canada.

5. Based on information provided by UCA2, HSI Chattanooga traced the "hejumpsaround" account to an IP address with a billing and service address of 116 S Hermitage Avenue, Lookout Mountain, Tennessee 37350. On October 23, 2024, SA Nalley served a DHS Summons for Information to the AT&T Global Legal Demand Center for subscriber information and call records for HAWLEY's cellular number (858) 997-6001. In response to the summons, SA Nalley received subscriber information confirming that Patrick HAWLEY is the subscriber for cellular number (858) 997-6001 and providing a billing address of 511 Georgia Avenue, Chattanooga, Tennessee 37403. Number (858) 997-6001 is assigned to an Apple iPhone device; an Apple iPhone is a facility and instrumentality of interstate and foreign commerce and did travel in and affect interstate commerce.

6. On September 18, 2024, Hawley texted a video to UCA2 of an adult female dressed as a black cat and a second person using a clear tube and scrub brush to force a live, white mouse into her vagina. Hawley told UCA2 that the woman in the video is his “ex fiancée, the love of my life. She was the first woman I dated who touched her daughters, she was very, very conflicted about it.”

7. On September 24, 2024, HSI C3 CEIU received information from the Federal Bureau of Investigations (FBI) Albany office advising that one of their online covert employees (OCE1) was on the Application A social media platform in an undercover capacity when OCE1 observed an individual using the moniker ULTIMATEDADBOD. This information was passed as the moniker ULTIMATEDADBOD was being actively deconflicted through various law enforcement databases. OCE1 stated that OCE1 observed ULTIMATEDADBOD distribute CSAM material within an Application A chat room that was monitored by OCE1. FBI Albany provided a recording of the portion of the chat room where OCE1 observed ULTIMATEDADBOD distribute nine suspected videos of CSAM/child pornography to the room.

8. On September 24, 2024, the C3 CEIU sent a video of the chat session observed by OCE1 as well as the distributed CSAM files. The video capture of the entire chat session for ULTIMATEDADBOD viewed by SA Nalley showed that the chat began on September 23, 2024, at 17:17 EDT. The room name contained the word “vetting” which, in the world of online undercover investigations, usually refers to a place where a person would prove they are not law enforcement by sharing CSAM with a room moderator or to the entire room. The end of the video showed a room moderator tell ULTIMATEDADBOD that he will be added to the rooms. OCE1 then switched to a secondary chat room where ULTIMATEDADBOD was added after his

vetting, and ULTIMATEDADBOD clicked on a file section showing more CSAM videos that ULTIMATEDADBOD had access to as a member of the group. Towards the end of the video, the recording showed ULTIMATEDADBOD comment on a video that appears to be CSAM of a toddler aged child.

9. SA Nalley viewed all the videos distributed by ULTIMATEDADBOD and determined them to be CSAM, one of which is described as follows:

**a9a951e0-79f1-11ef-b6c9-4d48a6f91f49.MOV.** This video is approximately 55 seconds long and begins with what appears to be two adult males, both with their penises erect and exposed. While one man is masturbating, the other is removing the diaper of what appears to be a toddler-aged male and proceeds to attempt to penetrate the anus of the toddler. Towards the end of the video, the masturbating male stops the other man as the toddler is beginning to cry. The video appears to have been produced in a public restroom stall at a diaper changing station.

10. On October 24, 2024, OCE1 provided SA Nalley with additional information concerning CSAM files distributed by HAWLEY on October 17, 2024, utilizing Application A messaging under the username ULTIMATEDADBOD. OCE1 provided a video recording of the room showing where HAWLEY had distributed twenty-one videos of CSAM. SA Nalley also observed on the recording that there were numerous CSAM files made available to the entire member group on Application A where HAWLEY was distributing files. At the time of the recording, there were more than two hundred members of the group present. The recording also showed that HAWLEY's last visit to the group was on October 22, 2024. When HAWLEY posted the videos, thumbnails of the videos were visible and downloadable to the group. SA Nalley observed that many of the CSAM videos were of infant and toddler aged children.



11. Your Affiant reviewed surveillance camera footage for 116 S Hermitage Avenue, Lookout Mountain, Tennessee 37350, on October 17, 2024, and was able to determine that, throughout the entire day, the vehicle registered to Patrick Bryant Hawley never left the residence or appeared to move from the parking pad where Hawley parked his 2011 Subaru Legacy Wagon with Tennessee tag number 542BBVN. Your Affiant went through several days' worth of surveillance video, and the only person who ever drove the 2011 Subaru Legacy appeared to be Patrick Bryant Hawley.

12. On October 29, 2024, HSI Chattanooga SA Nalley was notified that a second FBI OCE (OCE2) was in direct contact with HAWLEY utilizing Application A in an online, undercover capacity. At all times relevant to this investigation, OCE2 was located in Tennessee. OCE2 had been chatting with HAWLEY as ULTIMATEDADBOD since October 25, 2024. On October 29, 2024, HAWLEY explained to OCE2, "I'm really mainly into pedomoms, but you can't have a pedo mom without littles, and I'd have to say I prefer girls by far, and it's far sexier to see a mommy fucking-or be asked my mommy to fuck-pre-pubescent girls in that same range of birth through puberty, with 4-9 being the sweet spot." OCE2 and HAWLEY eventually revealed to each other that they were living near one another in Tennessee. HAWLEY also provided a selfie of himself early on in their online meeting. During their one-on-one chat conversations, HAWLEY expressed interest in meeting a second undercover agent that OCE2 introduced as "Lisa" who, as OCE2 described to HAWLEY, has a six-month-old child (notional). Ultimately, OCE2 introduced HAWLEY to a third FBI OCE (OCE3), a Task Force Officer who was acting as a mother interested in subjecting their child to sexual acts. At all times relevant to this investigation, OCE3 was located in Tennessee.

13. On October 30, 2024, OCE2 relayed information to HAWLEY that he had “pitched” the idea of meeting with the nominal mother “Lisa” (OCE3) and her notional child. OCE2 told HAWLEY that “Lisa” was “wondering if you would be interested first in just a vid of her (Lisa) an her baby (kylie) doing stuff. Like oral fingering etc. she would prob still want money.” HAWLEY responded to OCE2, saying, “I’d love a video of her plsyng [sic] with her baby! Again, glad to go halvsies with you on that, and you should ask if she’s ever let her baby suckle on her clit like a nipple. Strangely, women never seem to think of that.” When OCE2 said he would go ahead an ask her (Lisa/OCE3) “to make a vid with baby sucking her clit?” and, “If she down I’ll see what all she wants,” HAWLEY replied, “Perfect! Thanks man! This is the greatest thing ever!” After this, HAWLEY asked two additional times whether OCE2 has heard from “Lisa” about making the video of her child.

14. On October 30, 2024, HAWLEY discussed with OCE2 about having put “rats” in his ex-girlfriend’s vagina and informed OCE2 that the rats died during the process. HAWLEY then distributed a video to OCE2 of an adult female laying in a bathtub with the male who was speaking during the process pushing two live white rats into the female’s vagina through a clear tube. In the video, the rats are eventually removed from the female’s vagina and appear to be deceased. This video is the same video referenced in paragraph six above. Your Affiant reviewed the video of someone placing a mouse in the female’s vagina and describes it as follows:

**vcompress\_139.mov** is approximately four minutes and twenty-two seconds in length.

The video begins with two individuals talking as what appears to be a male hand uses a dish scrubbing brush and a make-shift funnel device to press what looks like a live mouse or small rat into a female’s exposed vagina. Once the mouse is inserted, the male asks

the female if she can feel the mice, and she says, "oh no no no." He asks if that's the worst thing she has ever felt. The male removes the funnel and backs the camera away to expose the face of the female with the mouse in her vagina and says "well, they're inside you." She asks if she can "crunch them." The viewer can see the tail of the mouse hanging out as well as the tattoos on the hands of the female as she plays with the tail of the mouse and her vagina. The female begins to push the mice out as if giving birth, and the male says, "He's dead." The viewer can immediately tell that two mice are coming out of the female's vagina. The female continues to try to push the mice out and eventually the male pulls them both out. Both mice are dead and dropped in the tub where the female is laying.

15. After distributing this video, HAWLEY admitted to being "a skosh paranoid" about his conversations with OCE2 and requested that OCE2 send him "any old crumb of CP"; later, HAWLEY said, "You're a little perfect as a pedo friend and kind of came out of nowhere, so I'm just trying to be a bit careful" and "Let's get this last trust-hurdle worked out and set up s [sic] hangout session. I'll bring you some when we get together."

16. HAWLEY and OCE2 eventually exchanged cellular numbers with HAWLEY providing (858) 997-6001 as his number. Further discussions involved the possibility of HAWLEY traveling to meet with the notional child, but HAWLEY was adamant about first of meeting with OCE2 alone and potentially engaging in sexual relations with OCE2. HAWLEY distributed the video of the rats being inserted into his ex-girlfriend's vagina a second time utilizing the cellular number (858) 997-6001. HAWLEY explained that the rat video was taken in his ex-girlfriend's parent's trailer and stated, "Yep. Love them Rossville girls."

17. On November 8, 2024, SA Nalley was notified by OCE2 that he was able to confirm an in-person meeting with HAWLEY for Thursday, November 14, 2024. This meeting was to include HAWLEY and OCE2 so that the two could get to know each other and, ultimately, to validate OCE2 as a fellow pedophile.

18. On November 9, 2024, the FBI received an online tip from a fourteen-year-old minor (hereinafter “Minor Victim”) in Pennsylvania. Minor Victim reported that HAWLEY had solicited, possessed, and distributed child pornography from and to Minor Victim and that the child pornography showed sexually explicit acts, including masturbation. Minor Victim stated that HAWLEY “was grooming me . . . and sent me MANY pictures of children ages 0-18 and sent photos of me to his fellow pedophile friends[.]” Minor Victim supplied identifiers that returned to HAWLEY.

19. In addition, Minor Victim reported similar information to a teacher at Minor Victim’s school. Consequently, on November 11, 2024, an officer with the Richland Township, Pennsylvania, Police Department interviewed Minor Victim. Minor Victim reported meeting HAWLEY on a “porn site” on September 17, 2024. Minor Victim stated that the conversation with HAWLEY turned sexual within five minutes of its start. Minor Victim admitted to sending multiple images of Minor Victim in various stages of undress and to sending images and videos of Minor Victim masturbating. Likewise, HAWLEY sent Minor Victim images and videos of himself masturbating and videos of other minors engaging in sex with animals. Minor Victim admitted that HAWLEY ended their relationship the previous weekend, which prompted her to contact the FBI. Minor Victim’s mother, who owns and pays for Minor Victim’s cell phone, agreed to turn over the cell phone to law enforcement and provided a signed consent for a



forensic examination of the phone; local law enforcement secured the cell phone and provided the cell phone to FBI Chattanooga.

20. A cursory review of the cell phone on November 12, 2024, shows that Minor Victim and HAWLEY communicated almost daily from September 17, 2024, until recently. HAWLEY made statements to Minor Victim like “society tries to keep children innocent” and that no age is too young for sexual exploitation. HAWLEY described for Minor Victim the poses and acts he—HAWLEY—wanted from Minor Victim, and Minor Victim followed HAWLEY’s instructions and sent to HAWLEY images that depict Minor Victim engaged in sexually explicit conduct (The images display her exposed genitalia.). HAWLEY and Minor Victim discuss Minor Victim’s age—that Minor Victim is fourteen years old—and HAWLEY made several statements referring Minor Victim’s age: “I love your bot [sic] little underaged fuckhole”; “I love showing it off to pedophiles online”; and “such a filthy little slut, God, 14 years old . . .” HAWLEY sent multiple photos of himself to Minor Victim—including nudes—that include a residential scene in the background with several features—a dresser with small drawers like a card catalog, a lamp with a green shade, displayed figurines, and a chain attached to a wall with handcuffs on the other end, to give a few examples—sufficiently unique to provide attribution for the residential location presented in the photos.

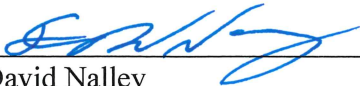
21. On November 14, 2024, HAWLEY appeared for a meeting with OCE2. At that time, your Affiant and other agents seized HAWLEY.

### **CONCLUSION**

Based on the foregoing, there is probable cause to believe that the federal criminal statutes cited herein have been violated, and that Patrick Bryant HAWLEY has committed these offenses. I respectfully request that this Court issue an arrest warrant for Patrick Bryant HAWLEY for

violations of 18 U.S.C. §§ 48, animal crushing; 2251(a), sexual exploitation of children; 2252/2252A certain activities relating to materials involving the sexual exploitation of minors; and 2422, coercion and enticement.

Respectfully submitted,

  
\_\_\_\_\_  
G. David Nalley  
Special Agent  
Homeland Security Investigations

Subscribed and sworn to before me this  
the 14<sup>th</sup> day of November 2024.

  
\_\_\_\_\_  
SUSAN K. LEE  
UNITED STATES MAGISTRATE JUDGE